

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC-JSC

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING
CONFIDENTIALITY BRIEFING**

By and through their undersigned counsel, the parties hereby stipulate and agree as follows:

1. Whereas, on August 21, 2020, Plaintiffs sent Facebook a letter challenging the confidentiality of 45 documents Facebook had produced to Plaintiffs and designated as Confidential or Highly Confidential – Attorneys’ Eyes Only, as follows:

FB-CA-MDL-00188612
FB-CA-MDL-00189441
FB-CA-MDL-00227873
FB-CA-MDL-00177962
FB-CA-MDL-00178254
FB-CA-MDL-00178146
FB-CA-MDL-00183235
FB-CA-MDL-00179356
FB-CA-MDL-00198496
FB-CA-MDL-00183209
FB-CA-MDL-00183225
FB-CA-MDL-00183320
FB-CA-MDL-00183181
FB-CA-MDL-00185088
FB-CA-MDL-00195572
FB-CA-MDL-00188486
FB-CA-MDL-00188479
FB-CA-MDL-00183250
FB-CA-MDL-00183245
FB-CA-MDL-00191995
FB-CA-MDL-00198323
FB-CA-MDL-00198268
FB-CA-MDL-00198236
FB-CA-MDL-00197181
FB-CA-MDL-00189595

FB-CA-MDL-00233426
FB-CA-MDL-00228319
FB-CA-MDL-00199181
FB-CA-MDL-00203259
FB-CA-MDL-00197243
FB-CA-MDL-00198226
FB-CA-MDL-00200219
FB-CA-MDL-00195790
FB-CA-MDL-00202384
FB-CA-MDL-00202952
FB-CA-MDL-00202239
FB-CA-MDL-00203710
FB-CA-MDL-00194166
FB-CA-MDL-00200215
FB-CA-MDL-00203464
FB-CA-MDL-00187051
FB-CA-MDL-00202398
FB-CA-MDL-00179201
FB-CA-MDL-00176216
FB-CA-MDL-00178469

2. Whereas, on October 10, 2020, Facebook filed an Emergency Administrative Motion to Remove from the Public Docket and Seal Confidential Materials (“Motion”). Dkt. 530.

3. Whereas, Plaintiffs filed an opposition to Facebook’s Motion on October 5, 2020. Dkt. 531.

4. Whereas, on October 7, 2020, the Court issued an order locking the docket entry at issue in Facebook’s Motion (Dkt. 526) and ordering the parties to meet and confer regarding Facebook’s claim of confidentiality. Dkt. 534.

5. Whereas, the parties have met and conferred and have not reached agreement regarding the confidentiality of the materials at issue in Facebook's Motion and Plaintiffs' August 21 letter.

THE PARTIES THEREFORE STIPULATE AND AGREE AS FOLLOWS:

1. Facebook will file an opening brief regarding its claim of confidentiality over the materials at issue in its Motion and Plaintiffs' August 21 letter by March 19, 2021. Facebook's brief shall be no more than 15 pages.

2. Plaintiffs will file their opposition brief by April 19, 2021. Plaintiffs' brief shall be no more than 15 pages.

3. Facebook will file its reply brief by May 3, 2021. Facebook's reply brief shall be no more than 10 pages.

Dated: February 12, 2021

KELLER ROHRBACK LLP

By: /s/ Derek W. Loeser
Derek W. Loeser

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DATED: February 12, 2021

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Respectfully submitted,

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATE: February 16, 2020



United States Magistrate Judge Jacqueline Corley

SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained.

DATED: February 12, 2021

By: /s/ Orin Snyder
Orin Snyder